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Attorney for Defendants

FILED
DISTRICT COURT OF GUAM

AUG 20 2007 *mbo*

JEANNE G. QUINATA
Clerk of Court

DISTRICT COURT OF GUAM

UNITED STATES OF AMERICA,	(Criminal Case No. 07-00078
)	
Plaintiff,	(REQUEST FOR DISCOVERY
)	
vs.	(
)	
CHARLENE F. TENORIO,	(
)	
Defendant.	(

1. Defendant Charlene F. Tenorio (hereinafter "Defendant") requests that the government disclose to Defendant the substance of any relevant oral statement made by Defendant, before or after arrest, in response to interrogation by a person Defendant knew was a government agent, if the government intends to use the statement at trial.

2. Defendant requests that the government disclose to Defendant, and make available for inspection, copying, or photographing, all of the following: (i) any relevant written or recorded statement by Defendant if the statement is within the government's possession, custody, or control and the attorney for the government knows—or through due diligence could know—that the statement exists; (ii) the portion of any written record containing

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the substance of any relevant oral statement made before or after arrest if Defendant made the statement in response to interrogation by a person Defendant knew was a government agent; and (iii) Defendant's recorded testimony before a grand jury relating to the charged offense.

3. Defendant requests that the government furnish Defendant with a copy of Defendant's prior criminal record that is within the government's possession, custody, or control if the attorney for the government knows—or through due diligence could know—that the record exists.

4. Defendant requests that the government permit Defendant to inspect and to copy or photograph books, papers, documents, data, photographs, tangible objects, buildings, or places, or copies or portions of any of these items, if the item is within the government's possession, custody, or control and (i) the item is material to preparing the defense; (ii) the government intends to use the item in its case-in-chief at trial; or (iii) the item was obtained from or belongs to Defendant.

5. Defendant requests that the government permit Defendant to inspect and to copy or photograph the results or reports of any physical or mental examination and of any scientific test or experiment if (i) the item is within the government's possession, custody, or control; (ii) the attorney for the government knows—or through due diligence could know—that the item

exists; and (iii) the item is material to preparing the defense or the government intends to use the item in its case-in-chief at trial.

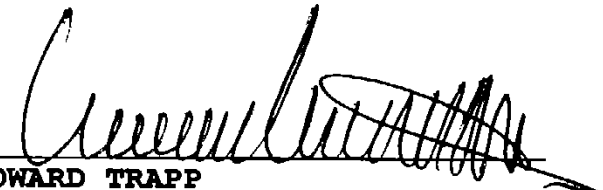
6. Defendant requests that the government give to Defendant a written summary of any testimony that the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief at trial. The summary must describe the witness's opinions, the bases and reasons for those opinions, and the witness's qualifications.

7. Defendant requests that the government give to Defendant notice of its intention to use (in its evidence-in-chief at trial) any of the evidence requested by Defendant in this request for discovery.

8. Defendant requests that the prosecution provide reasonable notice in advance of trial of the general nature of any evidence of other crimes, wrongs, or acts it intends to introduce at trial.

Dated, Hagåtña, Guam,

August 20, 2007.



HOWARD TRAPP
HOWARD TRAPP INCORPORATED
Attorney for Defendants

(REQUEST\Discovery.CTanorio)

DECLARATION OF SERVICE

I, Reina Y. Urbien, declare that I am an administrative assistant employed in the office of Howard Trapp Incorporated, Howard Trapp, Esq., the attorney for Defendants herein, and that on August 20, 2007, I served the document to which this declaration is annexed on Jeffrey J. Strand, Esq., Assistant United States Attorney, the attorney for Plaintiff herein, by leaving a copy thereof at Office of the United States Attorney for Guam and the Northern Mariana Islands, Suite 500, Sirena Plaza, 108 Hernan Cortez Avenue, Hagåtña, Guam, his last known address, with a person in charge thereof.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 20, 2007, at Hagåtña, Guam.



REINA Y. URBIEN